

FEDERAL COURT

B E T W E E N:

CANADIAN FRONTLINE NURSES AND KRISTEN NAGLE

Applicants

and

ATTORNEY GENERAL OF CANADA

Respondent

AFFIDAVIT OF DENIS BEAUDOIN

FEDERAL COURT

B E T W E E N:

CANADIAN CIVIL LIBERTIES ASSOCIATION

Applicant

and

ATTORNEY GENERAL OF CANADA

Respondent

AFFIDAVIT OF DENIS BEAUDOIN

FEDERAL COURT

B E T W E E N:

CANADIAN CONSTITUTION FOUNDATION

Applicant

and

ATTORNEY GENERAL OF CANADA

Respondent

AFFIDAVIT OF DENIS BEAUDOIN

FEDERAL COURT

B E T W E E N:

JEREMIAH JOST, EDWARD CORNELL, VINCENT GIRCYS, and HAROLD RISTAU

Applicants

and

**GOVERNOR IN COUNCIL, HER MAJESTY IN RIGHT OF CANADA, ATTORNEY
GENERAL OF CANADA, and MINISTER OF PUBLIC SAFETY AND EMERGENCY
PREPAREDNESS**

Respondents

AFFIDAVIT OF DENIS BEAUDOIN

I, Denis Beaudoin, of the city of Ottawa, in the Province of Ontario, swear that:

1. I am a superintendent for the Royal Canadian Mounted Police (RCMP). My current position is Director of Financial Crime, Federal Policing Criminal Operations. I have served in this position since 2021. My responsibilities in this role include overseeing financial crime operations for the RCMP nationally.
2. In this capacity, I was responsible for overseeing the use of the economic measures put in place under the Emergencies Act proclamation. I developed the process used by the RCMP for verifying and sharing information with financial institutions as described below. As such, I have personal knowledge of the information in my affidavit.

Economic Order and Regulations

3. On February 15, 2022, the Governor General in Council enacted the Emergency Economic Measures Order found at P.C. 2022-108 of the CTR (the Order), as well as the Emergencies Measures Regulations found at P.C. 2022-107 of the CTR (the Regulations), pursuant to its proclamation the previous day that a public order emergency existed.
4. On February 23, 2022, the Order and Regulations were revoked and ceased to apply.
5. The Order and Regulations did not apply retroactively and applied only to individuals who acted in contravention of sections 2 to 5 of the Regulations between February 15 and 23, 2022.

Objective and Scope of the Order and Regulations

6. The RCMP's primary role with respect to implementing the measures was to provide financial service providers with information gathered by police about people and companies potentially involved in illegal activities, which the financial service providers could use to ensure their compliance with the Order.
7. The Order gave financial institutions the ability to freeze financial products of individuals and companies involved in prohibited activities and gave law enforcement authority to share information with financial institutions with the ultimate goal to end illegal acts peacefully.

Implementation of the Order

8. Neither the Order nor Regulations specified a procedure through which financial service providers would identify individuals or entities that met the definition of "designated person" under the Order.

9. In practice, the police provided financial service providers with information about particular individuals or entities, which the financial service providers could use in conjunction with other information at their disposal to make their own determinations about whether they needed to take steps to comply with the Order.
10. Once the Order came into effect, the RCMP worked closely with municipal and provincial policing partners, including the Ontario Provincial Police (OPP) and Ottawa Police Service (OPS), to collect relevant information regarding persons, vehicles and entities that were believed to be directly or indirectly involved in prohibited activities.
11. The RCMP served as the conduit for sharing all information between police and financial service providers. The OPP and OPS provided the RCMP with relevant information in their possession and the RCMP validated this information and then shared it with financial service providers. I attach as **Exhibit "A"** a copy of a blank template that the RCMP used to provide the information it described, if available, to financial institutions.
12. During the eight days that the Order was in place from February 15 to 23, 2022, the RCMP disclosed information to banks, the Canadian Bankers Association, the Investment Industry Regulatory Organization of Canada, the Canadian Securities Administrators, credit unions, and the Mutual Fund Dealers Association of Canada.
13. The RCMP shared two main types of information with financial service providers: information obtained from the OPP and OPS regarding individuals already identified as part of their criminal investigations into the illegal protests and blockades; and information regarding trucks and other vehicles located in downtown Ottawa.
14. Initially, the RCMP shared with financial service providers the identities of 15 entities that the OPP and OPS had identified as suspects of their criminal investigation. Financial service providers used this information to determine whether to take action in order to comply with their obligations under the Order.
15. With respect to the second type of information, the OPP collected licence plate information and other identifying information of vehicles blockading downtown Ottawa. The RCMP then collected information from police and public sources to corroborate the presence of individuals and vehicles in the illegal protest. This information was then shared with financial service providers so that they could decide whether to take action in order to comply with the Order.
16. The RCMP and other law enforcement agencies focused their efforts on identifying and disclosing information pertaining to individuals and entities who were actively involved in illegal action, either by organizing or influencing the illegal activities or by being present at the illegal protest.

17. The RCMP did not disclose information pertaining to those who made donations in support of the protests or who purchased merchandise supporting the protests as it would have had no immediate impact to end the protest peacefully.
18. The RCMP communicated information to financial institutions but did not advise on the methods financial institutions should use to ensure compliance with the Order.
19. In a number of instances, the RCMP decided to not disclose information to the financial service providers following the investigative phase. The reasons for not disclosing were that there was not enough information to believe the person or entity was involved, the plate was invalid in the police database system, the person was attempting to leave but was unable, or it was no longer believed the person or entity was involved (either left on their own accord or were removed by police).
20. In total, the RCMP disclosed information on approximately 57 entities and individuals to financial service providers and approximately 257 accounts were frozen by financial institutions pursuant to the Order. Some individuals or entities had multiple accounts or services frozen.
21. Additionally, the RCMP identified and disclosed 170 Bitcoin wallet addresses to virtual currency financial service providers via a series of cryptocurrency alerts. These accounts received funds linked to the HonkHonkHodl crowdfunding campaign, which raised 20.7 Bitcoin with a value of between \$1 million to \$1.2 million during the period during which the Order was in force. No personal information was included in those alerts and this information was available publicly. I attach the three cryptocurrency alerts provided by the RCMP to financial service providers as **Exhibit "B"**.
22. The alerts noted that these e-wallets were linked to a joint RCMP and OPP/OPS investigation and directed the providers to cease facilitating transactions involving these e-wallets and to disclose relevant transaction information to the RCMP.
23. The RCMP clearly communicated to these electronic financial service providers that the Order was not to be applied retroactively and could only be applied while the Order was in effect.
24. Although the RCMP did not give information to financial institutions to enable them to freeze accounts of persons who had donated for use in the convoys and illegal blockades, some information was publicly available about donations that had been made to "GiveSendGo" for use in the illegal blockades.

Efforts to Minimize Negative Impact

25. The RCMP attempted to contact many of the individuals or entities whose information was to be disclosed to financial service providers, in order to re-confirm their ongoing participation in prohibited activities. For example, a number of individuals contacted by the RCMP confirmed that they were participating in the blockade in Ottawa and that they refused to leave. At that point, the RCMP advised the individuals of the Order and the risk that their bank accounts could be frozen.
26. Some people indicated when contacted that they wanted to leave, but were not in a position to do so because the streets were not cleared. These people were instructed to be ready and to make sure their truck was ready to leave when the streets were cleared. The information on these persons was not provided to the financial service providers.
27. The persons identified by the OPS and the OPP as suspects in their criminal investigation were not contacted prior to their information being shared.
28. After the illegal blockade was cleared, the RCMP reached out to some people to ascertain if it was their intention to return. Some indicated that they were not going back because they did not want their accounts frozen.
29. The Order imposed on financial service providers a duty to determine on a continuous basis if they were in possession of property owned, held or controlled by or on behalf of a designated person. Individuals who had their account frozen would have to contact their financial service provider to make arrangements to unfreeze their account. They could do this as soon as they stopped participating in the activities targeted by the Order. The RCMP facilitated this process by remaining in communication with financial service providers to assist them in assessing the involvement of their clients in the illegal activities.
30. On February 21, 2022, the RCMP communicated with the financial service providers and advised them that, without taking into account independent information available to financial entities, the RCMP no longer believes the individuals or entities disclosed were engaged in conduct or activities prohibited under the EMR, and therefore no longer met the criteria of a designated person under the Order. Attached as **Exhibit "C"** is an email with the subject line "Emergency Economic Measures Order (EEMO) - SITUATIONAL UPDATE."
31. Attached as **Exhibit "D"** is a copy of the RCMP statement about the unfreezing of accounts released by the RCMP on February 23, 2022.
32. The RCMP did not share information with insurance providers because the goal remained to facilitate a peaceful end to the blockade by allowing fully insured drivers to remove their vehicles from downtown Ottawa of their own volition.

33. As far as I am aware, all accounts that were frozen under the Order are now unfrozen.

Utility of the Order

34. The powers granted under the Order allowed the RCMP and other law enforcement agencies to work closely with Canadian financial institutions to implement asset freezes that strongly encouraged individuals to leave the illegal protests and deter the counselling of others to engage in prohibited activities. It also deterred protesters from staying in the area and coming back.
35. I believe the additional powers allowed by the Order played a role to resolve effectively an unprecedented, urgent, and rapidly evolving situation. The information the RCMP provided to financial service providers helped incentivize many involved in the blockade of downtown Ottawa to leave peacefully and minimized the risk of a violent end to the blockades by depriving those engaged in prohibited activities of access to funds.

Applicants Edward Cornell and Vincent Gircys

36. The RCMP disclosed the names of the Applicants, Edward Cornell and Vincent Gircys to financial institutions due to their overt participation in prohibited activities in Ottawa.
37. Both Mr. Cornell and Mr. Gircys participated in a press conference on February 16, 2022 at which they urged people to come to Ottawa to participate in prohibited activities. The press conference is posted on Instagram at [Kristen Nagle on Instagram: "Press conference with Daniel Bulford, Vincent Gircys, Eddie Cornell."](#)
38. I make this affidavit in response to the applications for judicial review in court file numbers T-306-22, T-347-22, T-316-22, and T-382-22 and for no other or improper purpose.

SWORN BEFORE ME at the City of
Ottawa, in the Province of Ontario
this 4th day of April, 2022


A Notary Public in and for the
Province of Ontario

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DENIS BEAUDOIN

Marc Germain Tremblay, a Commissioner etc.,
Province of Ontario, for the Government of Canada,
Department of Public Safety and Emergency Preparedness.
Expires November 25, 2022.

This is Exhibit "A" referred to in the
affidavit of

Denis Beaudoin

sworn before me this April 04/2022
day of April A.D., 2022



Notary Public in and for
the Province of Ontario

**Marc Germain Tremblay, a Commissioner etc.,
Province of Ontario, for the Government of Canada,
Department of Public Safety and Emergency Preparedness.
Expires November 25, 2022.**



File 2022-198524

Disclosure of Information

The following report is made pursuant to the *Emergency Economic Measures Order (SOR/2022-22)* and *Emergency Measures Regulations (SOR/2022-21)* enacted under the *Emergencies Act* on February 15th, 2022.

I, _____, am a regular member of the Royal Canadian Mounted Police (RCMP), currently posted to the RCMP's National Division (Ottawa area). I am engaged in the collection and disclosure of information to entities that have a duty to determine as defined in Section 3 of the *Emergency Economic Measures Order*.

The information being disclosed is relevant to individuals or entities that are engaged, directly or indirectly, in an activity prohibited by sections 2 to 5 of the above noted *Emergency Measures Regulations*.

The specific disclosure is related to the following individuals or entities:

The information collected has been compiled and summarized in the attached Appendix "A".

This document is the property of the Royal Canadian Mounted Police (RCMP). It is loaned to your agency on the understanding that it is not to be further disseminated, reclassified, or used in affidavits, court proceedings, or other legal or judicial process without the consent of the originator. Distribution within your agency is to be done on a need-to-know basis. The document is to be protected in accordance with normal safeguards for law enforcement information. Please contact the sender for any clarifications regarding the information or the caveat.

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APPENDIX "A"



VEHICLE PROFILE

Registered Owner

Name:

DOB :

Address (last known) :

Date of search:

Complete by :

Vehicle information

- XXX

Database checks

CPIC:

- XXX

PROS:

- XXX

PIP:

- XXXX

Open Source

Social Media Queries

Facebook:

Twitter:

LinkedIn:

Other:

Corporate Checks

Company involved:

Company Inquiries (reach out /call)

Company's involvement:

Vehicle Involved

Synopsis:

OCC Cameras

Observations:

Other Relevant Information

Information collected:

This is Exhibit "B" referred to in the
affidavit of

Denis Beaudoin

sworn before me this April 04, 2022
day of April A.D., 2022



Notary Public in and for
the Province of Ontario

Marc Germain Tremblay, a Commissioner etc.,
Province of Ontario, for the Government of Canada,
Department of Public Safety and Emergency Preparedness.
Expires November 25, 2022.

CRYPTOCURRENCY ALERT

The Ontario Provincial Police and Royal Canadian Mounted Police are currently investigating cryptocurrency donations being collected in relation to illegal acts falling under the scope of the *Emergency Measures Act*.

Pursuant to the *Emergency Economic Measures Order*, under subsection 19(1) of the *Emergencies Act*, there is a duty to cease facilitating any transactions pertaining to the following cryptocurrency address(es):

Any information about a transaction or proposed transaction in respect of these address(es), is to be disclosed immediately to the Commissioner of the Royal Canadian Mounted Police, at CryptocurrencyNHQ-CryptomonnaieDG@rcmp-grc.gc.ca.

Asset	Address
LTC	ltc1qqhzc2dflesccd5gx6ugqqgcplzakrk8wvxl8zq
ADA	addr1qxwxppd3ahfsh43f88h4jn8ngrum64fe6meck3nnwkwgtsp6elsk4xhyrdtm5v6tnq3ulw9u9gcmvkhjr4xcu3sm60hqtz3wuy
XMR	423nPDQqsPrAAGFSHaUBMrYQQCgb2562iLLWu1dZyEGEGsavxfpNxWtDjreSUzwqWQCxi6GrSz8jtYWjS4pW9mK9DoBVDWo
ETH	0x859481ef7dac321078547f50c756c8924eab183f
ETC	0x88cd1d4611d456357ef8620450d3121672305d03
BTC	bc1qvety2l3v508lmpal067kgghm6x6nsm70rgwhx
BTC	1Pk9TAxrXE1sQeYx3KXN77TfNjBDPxeEnk
BTC	bc1q82ejx54e9ra0la9n5whcaqegdr2f5j6ep0kep7
BTC	bc1qlc2gpmzrr9gded07d9a40lt2lq7pp2v7h4c5jx
BTC	bc1q2xjld87z45k2fuz48dqhntgh3e0k80ft0a46jd3ftwrqt4fnnyjqftd0ur
BTC	bc1q3jsfd54ja2jxnumjwq2ds6qn0yt0mye7lwvdmyft3a8a5w9d8hkqxf6az
BTC	bc1q48chzsuwxu7cz82p83mpekdn0u44c223r4dzsdd98d8l03ws7es484z23
BTC	bc1q4hqvw7a806yc8554nshkuyqc4jc6juywzxcgprk0n25rtcj5z3dkqey0h9f
BTC	bc1q7r7escgmm7nq2jhc92nc2uh7tw3vzexzspge65ts06243pensl2spf67vn
BTC	bc1q8lrztgk9tkedvhu6hzvvc7ps2cf6t2t4hj5jdf6p38asc407wxsl40gkx
BTC	bc1q8tf0hn3vda0pgkhej73unz338wstxvll9qrvv5hj3rtwah2j6mlqx3ce99
BTC	bc1q96z7hleyh2fvqmgc8s9yw0650u3uwjv7mrpsfj2ltz8wvctmcnsykh50c
BTC	bc1qcq44z6ly3h3635gfzkeh4lg22ks7ndy3dzzh0qyv3eqmzrwehnsk58gwr
BTC	bc1qfcw4nf659e4s8d9yaldltac75awrpqeqh76du68qzw8q0m7276sw0q3uh

BTC	bc1qg76ahdnvwwfd8l05wh0u4y54sht2s4djqpmp2vt0levqz7s62l9q4wh33n
BTC	bc1qhdek8my95y8pvxvj8lwmvdqcrkf6a5ny6l9lqyw42s2tz8rcgg0qrrz8yf
BTC	bc1qsderstsd6f8rswt0pklv3gckwtjtaszswzlmgdrat9hkvpwpqpsvcd39z
BTC	bc1qt6t5lddw7vxdzmcz0cdl6xnryrfmu2ywd64g0pw6k7czwl5xhfxs3e5sff
BTC	bc1qv3aa6wepvtlcy7kuvpmfzar93ku2yppp72tm0zfecj20h04r58sn7wvhq




BTC	bc1qv7k0hltgg5vdquy86z8m48wp7ul92hdddp2emh2ppra0slzvg86q8uv9g9
BTC	bc1qxxwx7r30fspqng769h080rpx4y2eksmwcecvrwyk7uwyl6lr0hnsllr9re
BTC	bc1q3ufme0prwe7xwacj32jt89r997xcwh2wmjkg129acetvf3q0wz4sp50j05
BTC	bc1qun9qcxcsc6avaa30anl0jvs36h3cy6nq7xh36yvx9frmqc8v6khq4nwnv0
BTC	bc1qzrst06qg2ve7x9a45z94hal882ecx9eqvcxttpq400cvqk6hkr6q0rcvjs
BTC	bc1q86ceuv0580rddxmqujhu3huxkcykrns2jah4vhqnlr67jdkh43sd5gcgr
BTC	bc1qep19mm4qq7eqtvhe3ys3ymwvs4z3rmyuhvfs3scsysnjdkvhpsfp6ven
BTC	bc1qv7k0hltgg5vdquy86z8m48wp7ul92hdddp2emh2ppra0slzvg86q8uv9g9
BTC	bc1qahvu2rtjyze9gn50skcs2q06vpfnznwdnsa9scxv5y6axudksskq2ku6hd
BTC	bc1qg3aeueyd4947tk9kfnzhrssxggy0ctn8zcjcdg0tk0gchzwwf7zq4zlnse

Thank you for your assistance with this investigation,

CryptocurrencyNHQ-CryptomonnaieDG@rcmp-grc.gc.ca

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bc1q02lht2z94cvxz7gku6x03zt8hql2ljex009a5c
bc1q062pkhf0yyp4uup0vg893h2z7vg9dtyhmfs57z
bc1q0aqfyyhaahe5tkgzl4yy8tn9sanhph48cw8gfh
bc1q2558369j3733ru8w2j44ft5a8wsvu9a3ctu58h
bc1q2h98w6llt99tuadm69j0vm6m6akuckww9hx490
bc1q2n980wq4e38eer3ssuqdfjfcygzmmxpynf07y3w
bc1q2symwvx8ak942m007eqpy3j5rgvmjza6l8mqyl
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bc1q2zahktl7mx7mcwgep522tvu5mqmmvd4cv5je3fc
bc1q4adfsxlr0kv4uj44u0303rs685hz49j43pdd2
bc1q4fuzwaf3qlr8nlrw54kvm6u3l5f65j4da96ue
bc1q4nhfc825w2qk6zwhkr0nsyw7l3qzzdjyqtwjz8
bc1q5uxrzg5ueduay62tm7mruj2dg52q67s7nfwq42
bc1q6rqf3xsle28gpl0jfuwq9267ddg6asglp75xnc
bc1q73n74fd4zxkljgsxtcrt3kce7z0vp5kqan2wq
bc1q7dws5swscn6krqx5ssmh68mlt2j0rlq9pjudat
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bc1q955pcz3pvveflycjs5julkdf24dswexn6m6p9
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bc1q9u49f5zgelxs94qfdqpx5lkp04hxxh82a6xt70
bc1q9vuly898kv3eggfe6c5h8xkclqkj0wk255ya77
bc1qa736kjpld8a4cr40u8qhxyfy6gczg7xvugynm
bc1qa7w48qjqmwa5kha5hq43x7nv6wecs554r72dae
bc1qau64e5dnu777jdk7x0eg3lx0sg2gxvlp59pzqz
bc1qauf86ykfemxnmhxgqxk7xgt8nlj7hs3vaw277a
bc1qc4jpl3y5slaexw5mzsch74tfheq2aje0ppsrnn



bc1qc6e90jmge6gc3z4mef7l77mlglhcf6ckgk07f
bc1qcv8n8c4zdzv28kg9f300u94g9tzz02g0pwc04v
bc1qcwk9pfe3ejnhen9yaj00g9j425fkmhqhsq55fl
bc1qdayxy58xpqxegtdh7qr5k95u45h2zgck7rcfnj
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bc1qdzc3mad58rwvydkkf792pdj9ed96drd4hvx6sg
bc1qedzgpqxhwtc47aga8wp3q8a8wtysar65wzycxq
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bc1qeru88jc6sctujqzexfcj0d0l8xh8atkd9dty9
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bc1qfsjg76l6rpn7wy5303weyvujym4mr3x727y6hl
bc1qfwemm3m3tsyvyuwaljqrvt284f7pvnn4tuf2
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bc1qg7eep47tk926mugz9zcyfw5jdu7rk6r7netj3r
bc1qgwjskc628eh9sgnc0ypvkhwtzcky42zz7s0tfv
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bc1qjvwdxw2fppxhshfrcqvqxscsmxhz5jvtg2nnxt
bc1qjvw3z5c4nwdr2n5tzsrcgzlu2ncu8sn5kft3qh
bc1qk06vldq76vxtf89zf6uzfs36eg0wlh0eqcdf6
bc1qk3r6xntye0m3ltpedx30rymjxdlvhtpkrecrj
bc1qkkg7a6npchmk4l3dpqvs7dwmr7fupcqna3kq24
bc1qkqjkztfnaalexjk5hpevtqc0m80wt5rzut7fztk
bc1qku26gqyxhg0vr49qduln0tn2afj88zwmraqen
bc1qkuljh9qjdz447ytzgtzp9grnk7ptzdez0m3eg
bc1qlk00tuxqss5v03upwz3lk9yhhwgaka0vu59u2a
bc1qln80c0pmups7zxxm2fcfdmzvz8gxlryr8nl6q
bc1qm67k7w69rht724navu6jjrhfk93pmdjw8lrh38
bc1qm6u4pxcskca8qhx4e2e7jk8ue0q6p8dwp3w0sf
bc1qmq6h2dh7ctqrmv45ljght9y6m8yjh3z8qcse4
bc1qn9r0daf77x0arqydkj20d7k5405jd9yjk4m0ct
bc1qnmau5dd22w0r3ss7ta75er6v7m0trq8qgn726p
bc1qnyq8cms0edc30q0rz8vxgpmx43vplp6tun5twm
bc1qp79usamhvie94xn5tnfz9zuwsk6z3nk7px9nfw
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bc1qpntau44awgvnc8de6nm76ah0fp06ethvzcx46a
bc1qpp3rfw3m6whmcmcr4vl9ruzau7awrtqz6s2x76
bc1qq7644eh7qwyfx4zam4e6qfqr60wkgxscte4
bc1qqkqr720fptpk0378n7tcgj36w8c7y5qqpert87
bc1qqt9gsfcg5rnldsw0ewwekke0tl9x3969k772t6
bc1qqzpunlksl3sfsthhm9hnahtwvn8k2em5zumkhp



bc1qr4t3jqy74qglk63m6lazzpf6rldtklma9t49ur3
bc1qr6eyjgvxydh0faafkytldq2mgylkyr2uytle
bc1qreqp95msmhfn05gg5mj79qw6gsq0nk6clwyy2w
bc1qrgghds8uyutmc6phppelf8gaa8jrea9fc3nzhze
bc1qrnaesgdw882wkhvwmydry03vcu2sml4e5vrnm7
bc1qrr0j3s4ac8ts7rg8ueut9zjy0u46w4pqly69mk
bc1qsw3dldtexgks9sdtqu787kef8jvgera6qem8c
bc1qtnmruuunwww3ra8rhu0anqjcfxfjvuqyf0643
bc1qtq8tdeuv39szw8x0pffnung8g5kjjx69um93az
bc1quk03t4e0f6qug90vptl42lyh3npkl08e74zsn
bc1quxv0zw39ch8jtuvpglq9wh8udxj6plgg2c5yvt
bc1quz767qg2w6grgp4yh66h8custdjhcuqwx2s4al
bc1qv7flh8apx6radxuusqyzkwelecl545rhztwtc
bc1qvk6nfwe728nvkz2p3qufwhjga7z6ctw8dyzry
bc1qvm78tmv3z70gzp22jp79nxm4s5yacz4scm2rgv
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Thank you for your assistance with this investigation, CryptocurrencyNHQ-CryptomonnaieDG@rcmp-grc.gc.ca.



CRYPTOCURRENCY ALERT

The Ontario Provincial Police and Royal Canadian Mounted Police are currently investigating cryptocurrency donations being collected in relation to illegal acts falling under the scope of the *Emergency Act*.

Pursuant to the *Emergency Economic Measures Order*, under subsection 19(1) of the *Emergencies Act*, there is a duty to cease facilitating any transactions pertaining to the following cryptocurrency address(es):

Any information about a transaction or proposed transaction in respect of these 114 address(es), is to be disclosed immediately to the Royal Canadian Mounted Police, at CryptocurrencyNHQ-CryptomonnaieDG@rcmp-grc.gc.ca.

bc1q02lht2z94cvxz7gku6x03zt8hql2ljex009a5c
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bc1qzzt7hls8339j9lu9eegmtv9x8y66n40qvl6d5	

Thank you for your attention to this matter,

CryptocurrencyNHQ-CryptomonnaieDG@rcmp-grc.gc.ca.

This is Exhibit "C" referred to in the
affidavit of

Denis Beaudoin

sworn before me this April 04/2022
day of April A.D., 2022



Notary Public in and for
the Province of Ontario

**Marc Germain Tremblay, a Commissioner etc.,
Province of Ontario, for the Government of Canada,
Department of Public Safety and Emergency Preparedness.
Expires November 25, 2022.**

From: [FPCO Financial Crime / OCPF Criminalité Financière](#)
Sent: February 21, 2022 1:14 PM
To: [FPCO Financial Crime / OCPF Criminalité Financière](#)
Subject: RE: Emergency Economic Measures Order (EEMO) - SITUATIONAL UPDATE

Good day,

Following the publishing of the *Emergency Economic Measures Act* (EEMO), the RCMP and its policing partners have provided you information regarding specific individuals and entities in an effort to contribute to the application of the EEMO by assisting to identify property belonging to people who were engaged in the illegal activities set out in the *Emergency Measures Regulations* (EMR). Following these disclosures, financial assets were frozen.

Not taking into account independent information available to financial entities, the RCMP no longer believes the above-mentioned individuals or entities are engaged in conduct or activities prohibited under the EMR, and therefore no longer meet the criteria of a designated person under the Order.

As the law is still currently in effect, listed entities must determine on a continuing basis whether they are in possession or control of property that is owned, held or controlled by, or on behalf of, a designated person.

Should information about designated persons becomes available, the RCMP may decide to disclose further information to financial entities to contribute to the application of the EEMO.

Thank you,
 Kelley

Kelley Hughes (Cpl.)

Federal Policing Criminal Operations - Financial Crime (FPCO-FC) |
 Opérations criminelles de la Police fédérale – Criminalité Financière (OCPF-CF)
 Royal Canadian Mounted Police (RCMP) | Gendarmerie royale du Canada (GRC)
 National Headquarters | Direction générale
 Ottawa, ON
Phone/Tél: (343) 550-7279

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From: FPCO Financial Crime / OCPF Criminalité Financière
Sent: February 21, 2022 12:23 PM
To: FPCO Financial Crime / OCPF Criminalité Financière <FPCOFC-OCPFCF@rcmp-grc.gc.ca>
Subject: Emergency Economic Measures Order (EEMO) - SITUATIONAL UPDATE

Good afternoon,

We would like to reassure you that it remains our priority to communicate information that may assist listed entities with their assessment to unfreeze financial products related to the disclosures of designated person information.

Although we are not currently in a position to do that yet, we anticipate being able to provide you with relevant information later this afternoon.

Thank you for your continued patience and understanding as we work through this complex time together.

Kelley

Kelley Hughes (Cpl.)

Federal Policing Criminal Operations - Financial Crime (FPCO-FC) |
Opérations criminelles de la Police fédérale – Criminalité Financière (OCPF-CF)
Royal Canadian Mounted Police (RCMP) | Gendarmerie royale du Canada (GRC)
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This is Exhibit "D" referred to in the
affidavit of

Denis Beaudoin

sworn before me this April 04, 2022
day of April A.D., 2022



Notary Public in and for
the Province of Ontario

**Marc Germain Tremblay, a Commissioner etc.,
Province of Ontario, for the Government of Canada,
Department of Public Safety and Emergency Preparedness.
Expires November 25, 2022.**



STATEMENT

Enforcement under the *Emergencies Act – Unfreezing of accounts*

The *Emergencies Act* has allowed law enforcement and monitoring agencies to work more closely with Canadian financial institutions; which has enhanced the effectiveness of law enforcement's investigations pertaining to the illegal convoy protests.

The RCMP and its policing partners used the Emergency Economic Measures Order to strongly encourage individuals to leave the illegal protests and deter them from counselling others to commit criminal offences.

The RCMP provided relevant information to financial institutions, who have the onus to determine which financial products should be frozen, pertaining to entities (i.e. individuals or companies) believed to be involved in illegal acts. As previously stated, at no time did the RCMP disclose information on donors or on those who purchased merchandise.

As of February 21, 2022, the RCMP has gone back to financial institutions with some updated information about certain entities whose status may have changed pertaining to the illegal protest activity. This new information can be assessed alongside all other information to help inform decisions to unfreeze certain accounts.



DÉCLARATION

Application de la loi en vertu de la *Loi sur les mesures d'urgence* – Dégel de comptes

La *Loi sur les mesures d'urgence* a permis aux organismes d'application de la loi et de surveillance de collaborer plus étroitement avec les institutions financières canadiennes et d'ainsi accroître l'efficacité des enquêtes policières sur les manifestations illégales entourant le convoi de la liberté.

La GRC et ses partenaires policiers ont eu recours au *Décret sur les mesures économiques d'urgence* pour encourager fortement des individus à quitter les lieux des manifestations illégales et les dissuader de conseiller à d'autres personnes de commettre des infractions criminelles.

La GRC a fourni aux institutions financières, qui ont la responsabilité de déterminer quels produits financiers doivent être gelés, des renseignements pertinents au sujet d'entités (individus ou entreprises) que l'on croit participer à des actes illégaux. Comme il a été déclaré précédemment, la GRC n'a à aucun moment divulgué de renseignements sur des donateurs ou des personnes qui ont acheté des marchandises.

En date du 21 février 2022, la GRC a transmis des renseignements actualisés aux institutions financières sur certaines entités dont la situation peut avoir changé relativement aux manifestations illégales. Ces nouveaux renseignements peuvent être évalués au même titre que toutes les autres informations disponibles afin d'éclairer les décisions relatives au dégel de certains comptes.

FEDERAL COURT

BETWEEN:

CANADIAN FRONTLINE NURSES AND KRISTEN NAGLE

Applicants

and

ATTORNEY GENERAL OF CANADA

Respondent

AFFIDAVIT OF DENIS BEAUDOIN
